

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
	Ref. No. __

**ORDER SUSTAINING DEBTORS' FIFTY-FIRST (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN DUPLICATE
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the fifty-first omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated:

Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Duplicate Portal Claims

FTX Trading Ltd. 22-11068 (JTD)
Fifty-First Omnibus Claims Objection
schedule 1 - Substantive Duplicate Claims

Claims to be Disallowed						Surviving Claims					
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity		
93251	Name on file	FTX Trading Ltd.	BTC	0.0249956400000000	80694*	Name on file	FTX Trading Ltd.	ADA-PERP	0.0000000000000000		
			ETHW	2.088882100000000				BTC	0.024995644442310		
			EUR	10,210.0000000000000000				BTC-PERP	0.0000000000000000		
			FTT	16.8000000000000000				CRO-PERP	0.0000000000000000		
			LTC	5.1200000000000000				DENT-PERP	0.0000000000000000		
			SOL	4.9291126000000000				DOT-PERP	0.0000000000000000		
			USD	12,977.2700000000000000				ETH-PERP	0.0000000000000000		
								ETHW	2.088882100000000		
								EUR	10,000.0000000000000000		
								FTT	16.8000000000000000		
								LINK-PERP	0.0000000000000000		
								LTC	5.1200000000000000		
								LTC-PERP	0.0000000000000000		
								SOL	4.9291126000000000		
								SOL-PERP	0.0000000000000000		
								USD	12,977.26791364450000		
								VET-PERP	0.0000000000000000		
								XRP-PERP	0.0000000000000000		
								XTZ-PERP	0.0000000000000000		

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Fourteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

91534	Name on file	West Realm Shires Services Inc.	BCH	0.0000001000000	56132*	Name on file	West Realm Shires Services Inc.	BCH	0.0000001000000
			BTC	2,505.0451000000000000				BTC	15.450304782658600
			SOL	0.0000002000000				SOL	0.0000002000000
			USD	0.000000000000000				USD	-228,929.679439957000000

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered discharged on the Debtor's Twelfth (Substantive) Omnibus Objection to Certain Overstated Pre-Settlement Claims (Customer Claims).								
91956	Name on file	FTX Trading Ltd.	1INCH-PERP	0.0000000000000000	15697*	Name on file	FTX Trading Ltd.	1INCH-PERP
			AAVE-PERP	0.0000000000000005				AAVE-PERP
			APE-PERP	0.0000000000007275				APE-PERP
			ATLAS	69,904.4680000000000000				ATLAS
			ATOM-PERP	0.0000000000000000				ATOM-PERP
			AUDIO-PERP	0.0000000000000000				AUDIO-PERP
			AVAX-PERP	0.0000000000000000				AVAX-PERP
			AXS-0930	0.0000000000000000				AXS-0930
			AXS-PERP	-0.0000000000000056				AXS-PERP
			BNB	3.7600000000000000				BNB
			BTC	0.5012886200000000				BTC
			BTC-0624	0.0000000000000000				BTC-0624
			BTC-0930	0.0000000000000000				BTC-0930
			BTC-PERP	0.0000000000000001				BTC-PERP
			CHR-PERP	0.0000000000000000				CHR-PERP
			CHZ-0624	0.0000000000000000				CHZ-0624
			CHZ-PERP	0.0000000000000000				CHZ-PERP
			DOGE-PERP	0.0000000000000000				DOGE-PERP
			DOT-PERP	-0.0000000000000113				DOT-PERP
			ETH	0.8590000000000000				ETH
			ETH-0624	0.0000000000000000				ETH-0624
			ETH-PERP	-0.0000000000000001				ETH-PERP
			GALA-PERP	0.0000000000000000				GALA-PERP
			HOT-PERP	0.0000000000000000				HOT-PERP
			KSHIB-PERP	0.0000000000000000				KSHIB-PERP
			LRC-PERP	0.0000000000000000				LRC-PERP
			LUNC-PERP	0.0000000000000000				LUNC-PERP
			NEAR-PERP	0.0000000000000000				NEAR-PERP
			SLP-PERP	0.0000000000000000				SLP-PERP
			SOL	70.78000000000000				SOL
			SOL-0325	0.0000000000000000				SOL-0325
			SOL-PERP	-0.0000000000000056				SOL-PERP
			SRN-PERP	0.0000000000000000				SRN-PERP
			STMX-PERP	0.0000000000000000				STMX-PERP
			THETA-PERP	0.0000000000000000				THETA-PERP
			TRX-PERP	0.0000000000000000				TRX-PERP
			USD	996.006649786902021				USD
			USDT	651,255.0000000000000000				USDT
			USDT-20211231	0.0000000000000000				USDT-20211231
			VET-PERP	0.0000000000000000				VET-PERP
			WAVES-PERP	0.0000000000000000				WAVES-PERP
			ZRX-PERP	0.0000000000000000				ZRX-PERP

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Fifteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

92951	Name on file	FTX EU Ltd.	AAVE-PERP	0.0000000000000000	54893*	Name on file	FTX Trading Ltd.	AAVE-PERP	0.0000000000000000
			ALGO-PERP	178.00000000000000				ALGO-PERP	178.00000000000000
			ALT-PERP	0.0000000000000000				ALT-PERP	0.0000000000000000
			APE	0.0000000020000000				APE	0.0000000020000000
			APE-PERP	-0.000000000000085				APE-PERP	-0.000000000000085
			AR-PERP	-0.000000000000067				AR-PERP	-0.000000000000068
			ATLAS	0.00000021468511				ATLAS	0.00000021468511
			ATOM	0.000000000257129				ATOM	0.000000000257129
			ATOM-PERP	-0.000000000000047				ATOM-PERP	-0.000000000000048
			AVAX	0.00000015644559				AVAX	0.00000015644559

Claim Number	Claims to be Disallowed				Surviving Claims				
	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
	AVAX-PERP			0.0000000000000014		AVAX-PERP			0.0000000000000014
	BAT			0.000000001418000		BAT			0.000000001418000
	BNB			0.000000026486870		BNB			0.000000026486870
	BNB-PERP			0.0000000000000000		BNB-PERP			0.0000000000000000
	BOBA			0.0000000016355000		BOBA			0.0000000016355000
	BOBA-PERP			0.000000000000397		BOBA-PERP			0.000000000000398
	BTC			0.0038600000000000		BTC			0.001783022456545
	BTC-PERP			0.0059000000000000		BTC-PERP			0.0059000000000000
	C98			0.000000008571369		C98			0.000000008571369
	CAKE-PERP			0.000000000000056		CAKE-PERP			0.000000000000057
	CEL			0.000000003748032		CEL			0.000000003748032
	CHR			0.000000003944943		CHR			0.000000003944943
	CHZ			0.000000004838628		CHZ			0.000000004838629
	CHZ-PERP			0.0000000000000000		CHZ-PERP			0.0000000000000000
	CREAM-PERP			0.0000000000000001		CREAM-PERP			0.0000000000000002
	CRV-PERP			0.0000000000000000		CRV-PERP			0.0000000000000000
	DEFI-PERP			0.0000000000000000		DEFI-PERP			0.0000000000000000
	DENT			0.000000005923246		DENT			0.000000005923246
	DOGE			0.000000005168896		DOGE			0.000000005168896
	DOGE-PERP			0.0000000000000000		DOGE-PERP			0.0000000000000000
	EDEN			0.000000003389769		EDEN			0.000000003389770
	EGLD-PERP			0.0000000000000001		EGLD-PERP			0.0000000000000002
	ENJ			0.000000009679394		ENJ			0.000000009679394
	ENJ-PERP			0.0000000000000000		ENJ-PERP			0.0000000000000000
	ENS			0.0000000060000000		ENS			0.0000000060000000
	ENS-PERP			-0.000000000000036		ENS-PERP			-0.000000000000036
	EOS-PERP			-0.000000000000056		EOS-PERP			-0.000000000000057
	ETC-PERP			-0.000000000000007		ETC-PERP			-0.000000000000007
	ETH			0.0490000000000000		ETH			0.0000000023054657
	ETH-0930			0.0000000000000000		ETH-0930			0.0000000000000000
	ETH-1230			0.0000000000000000		ETH-1230			0.0000000000000000
	ETH-PERP			0.0000000000000000		ETH-PERP			0.0000000000000000
	ETHW			0.0000000015369075		ETHW			0.0000000015369075
	FIDA			0.00000005587992		FIDA			0.00000005587993
	FLUX-PERP			0.0000000000000000		FLUX-PERP			0.0000000000000000
	FTM			0.000000008667251		FTM			0.000000008667252
	FTT			0.0837700000000000		FTT			0.0000000020880185
	FTT-PERP			-0.000000000000142		FTT-PERP			-0.000000000000142
	GLMR-PERP			0.0000000000000000		GLMR-PERP			0.0000000000000000
	GODS			0.000000011719203		GODS			0.000000011719203
	GOG			0.00000004742935		GOG			0.00000004742936
	GRT			0.000000008355000		GRT			0.000000008355000
	GRT-PERP			0.0000000000000000		GRT-PERP			0.0000000000000000
	HNT			0.000000008063137		HNT			0.000000008063138
	HNT-PERP			0.0000000000000767		HNT-PERP			0.0000000000000767
	HOLY			0.000000008749008		HOLY			0.000000008749008
	IMX			0.000000011348074		IMX			0.000000011348075
	JASMY-PERP			0.0000000000000000		JASMY-PERP			0.0000000000000000
	JOE			0.000000006166220		JOE			0.000000006166220
	KAVA-PERP			0.0000000000000000		KAVA-PERP			0.0000000000000000
	KIN			0.000000012924153		KIN			0.000000012924153
	KSM-PERP			0.0000000000000015		KSM-PERP			0.0000000000000016
	LINK			0.0000000027980692		LINK			0.0000000027980692
	LINK-PERP			-0.000000000000039		LINK-PERP			-0.000000000000040
	LRC-PERP			0.0000000000000000		LRC-PERP			0.0000000000000000
	LTC			0.0000000060000000		LTC			0.0000000060000000
	LUNA2			0.9467825900000000		LUNA2			0.9467825900000000
	LUNA2_LOCKED			2.2091593767000000		LUNA2_LOCKED			2.2091593767000000
	LUNC-PERP			0.0000000000000000		LUNC-PERP			0.0000000000000000
	MANA			0.00000004793416		MANA			0.00000004793417
	MANA-PERP			0.0000000000000000		MANA-PERP			0.0000000000000000
	MATIC			0.000000025062769		MATIC			0.000000025062769
	MATIC-PERP			0.0000000000000000		MATIC-PERP			0.0000000000000000
	MBS			0.000000003865200		MBS			0.000000003865200
	MER			0.00000000666727		MER			0.00000000666727
	MINA-PERP			0.0000000000000000		MINA-PERP			0.0000000000000000
	MNGO			0.000000014177788		MNGO			0.000000014177788
	NEAR			0.00000006197830		NEAR			0.00000006197830
	NEAR-1230			0.0000000000000000		NEAR-1230			0.0000000000000000
	NEAR-PERP			-0.000000000000147		NEAR-PERP			-0.000000000000147
	NEO-PERP			0.0000000000000000		NEO-PERP			0.0000000000000000
	OKB-PERP			0.0000000000000014		OKB-PERP			0.0000000000000014
	ONE-PERP			0.0000000000000000		ONE-PERP			0.0000000000000000
	PERP			0.000000015270441		PERP			0.000000015270442
	PERP-PERP			-0.000000000000227		PERP-PERP			-0.000000000000227
	POLIS			0.000000006474261		POLIS			0.000000006474261
	RAY			0.00000007450039		RAY			0.00000007450040
	RAY-PERP			0.0000000000000000		RAY-PERP			0.0000000000000000
	REEF-PERP			0.0000000000000000		REEF-PERP			0.0000000000000000
	REN			0.00000006400000		REN			0.00000006400000
	REN-PERP			0.0000000000000000		REN-PERP			0.0000000000000000
	ROSE-PERP			0.0000000000000000		ROSE-PERP		</td	

Claim Number	Claims to be Disallowed				Surviving Claims				
	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
	RVN-PERP			0.0000000000000000			RVN-PERP		0.0000000000000000
	SAND			0.00000010243968			SAND		0.00000010243968
	SAND-PERP			0.0000000000000000			SAND-PERP		0.0000000000000000
	SECO			0.00000012742160			SECO		0.00000012742160
	SHIB			0.000000004695323			SHIB		0.000000004695324
	SLRS			0.00000014487078			SLRS		0.00000014487079
	SNX			0.00000005000000			SNX		0.00000005000000
	SOL			0.00000013889191			SOL		0.00000013889191
	SOL-PERP			-0.00000000000006			SOL-PERP		-0.00000000000006
	SRM			0.00000016534410			SRM		0.00000016534411
	SRM-PERP			0.00000000000000			SRM-PERP		0.00000000000000
	STARS			0.00000007931609			STARS		0.00000007931610
	STEP			0.00000015505206			STEP		0.00000015505206
	STORJ-PERP			0.00000000000000			STORJ-PERP		0.00000000000000
	SUSHI-PERP			0.00000000000000			SUSHI-PERP		0.00000000000000
	TLM			0.00000009600000			TLM		0.00000009600000
	TONCOIN			0.00000021352899			TONCOIN		0.00000021352900
	TONCOIN-PERP			0.00000000000245			TONCOIN-PERP		0.00000000000245
	TRX			0.00079800000000			TRX		0.00079800000000
	TRX-PERP			0.00000000000000			TRX-PERP		0.00000000000000
	TULIP			0.00000005438567			TULIP		0.00000005438567
	UNI-PERP			0.00000000000000			UNI-PERP		0.00000000000000
	USD			1,304.560000000000			USD		-164.77546936768000
	USDT			0.002716032793383			USDT		0.002716032793384
	WAVES-0624			0.00000000000000			WAVES-0624		0.00000000000000
	WAVES-PERP			0.00000000000000			WAVES-PERP		0.00000000000000
	XMR-PERP			0.00000000000000			XMR-PERP		0.00000000000000
	YFI			0.00000006000000			YFI		0.00000006000000
	ZEC-PERP			-0.00000000000007			ZEC-PERP		-0.00000000000007

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

48712	Name on file	FTX Trading Ltd.	ATLAS	26.74304879000000	48706	Name on file	FTX Trading Ltd.	ATLAS	26.74304879000000
			ETH	0.00001168000000			ETH	0.00001168000000	
			ETHW	0.00001168000000			ETHW	0.00001168000000	
			SOL	0.00045943000000			SOL	0.00045943000000	
			SRM	17.49076669000000			SRM	17.49076669000000	
			SRM_LOCKED	59.17536023000000			SRM_LOCKED	59.17536023000000	
			USD	0.094303170452320			USD	0.094303170452320	
			USDC	9,589.06000000000000			USDC	9,589.00000000000000	
			USDT	0.00000002500000			USDT	0.00000002500000	
			USDT-PERP	0.00000000000000			USDT-PERP	0.00000000000000	

Reason: The claim to be disallowed is substantively duplicative of the surviving claim.

91366	Name on file	FTX Trading Ltd.	BTC	0.0000344300000000	79059*	Name on file	FTX Trading Ltd.	BTC	0.0000849400000000
			ETH	0.00099314000000			ETH	0.00099314000000	
			USD	0.00310480000000			USD	0.00000000000000	
			USDT	2,284,267.13412690000000			USDT	518,981.00000000000000	
			ETH-PERP				ETH-PERP	-0.00000000000000	
			TRX				TRX		518,981.00000000000000
			USD				USD	0.172137232078666	

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

30599	Name on file	FTX Trading Ltd.	TRX	0.0000490000000000	30564	Name on file	FTX Trading Ltd.	BTC	0.5690468000000000
			USD	5,490.42000000000000			USD	4.72574860000000	
			USDT	4,332.98000000000000			USDT	1.19708051000000	

Reason: The claim to be disallowed is substantively duplicative of the surviving claim.